

EXHIBIT 1

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7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 ROBERT HUNTER BIDEN,
11

12 Plaintiff,
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14 vs.
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16 PATRICK M. BYRNE,
17 Defendant.
18

Case No.: 2:23-cv-09430-SVW-PD
Judge: Honorable Stephen V. Wilson
Courtroom: 10A

**DEFENDANT PATRICK M.
BYRNE'S FURTHER RESPONSES
TO REQUESTS FOR ADMISSION,
SET ONE, TO PLAINTIFF
ROBERT HUNTER BIDEN**

Complaint Filed: November 8, 2023

1 **PROPOUNDING PARTY:** Plaintiff, ROBERT HUNTER BIDEN

2 **RESPONDING PARTY:** Defendant, PATRICK M. BYRNE

3 **SET NO.:** Set One (1)

4 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

5 Defendant Patrick M. Byrne ("Responding Party") hereby responds to the
6 Requests for Admission, Set One, propounded by Plaintiff Robert Hunter Biden
7 ("Propounding Party") as follows:

8 **PRELIMINARY STATEMENT**

9 1. It is to be noted that this Responding Party has not fully completed
10 investigation of the facts, discovery, and preparation for the trial of this case. The
11 following responses are based only on such information and documents which are
12 presently available to and specifically known to this responding party and discloses
13 only those contentions presently known to the responding party. It is anticipated
14 that further discovery, independent investigation, legal research, and analysis will
15 supply additional facts, add meaning to the known facts, as well as establish
16 entirely new factual conclusions and legal contentions. This discovery,
17 independent investigation, legal research, and analysis may lead to additions,
18 changes and/or variations from the contentions set forth herein.

19 2. The following responses are given without prejudice to the
20 Responding Party's right to produce any subsequently discovered evidence which
21 this Responding Party may later recall. The Responding Party reserves the right to
22 change any and all of the following responses as additional facts are ascertained,
23 legal research is completed and analysis and contentions are made. The following
24 responses are made in good faith to supply factual information and as much
25 specification of legal contentions as are presently known, but shall in no way
26 prejudice the responding party in relation to further discovery, research or analysis.

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GENERAL OBJECTIONS

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2 1. The objections below are incorporated into the Responding Party's
3 responses, whether or not specific reference is made to such objection in the
4 response to a particular request.

5 2. This answering party objects generally to each request to the extent it
6 seeks the disclosure of information protected by the attorney-client privilege.

7 3. This answering party objects generally to each request to the extent it
8 seeks disclosure of information protected by the attorney-work product doctrine.

9 4. This answering party objects generally to each of the "Definitions"
10 contained in Requests for Production, Set One on the grounds that such
11 "Definitions" are vague, ambiguous, overbroad, compound, unduly burdensome,
12 assumes facts not in evidence and denied, oppressive, and if interpreted literally,
13 impossible to answer and Plaintiff is using said "Definitions" to try and evade in
14 bad faith the obligation of Plaintiff to describe by category and with reasonable
15 particularity the documents that Plaintiff is seeking and as required pursuant to the
16 provisions of Federal Rule of Civil Procedure §34(b)(1)(A) and will not use them
17 to respond to these requests to produce.

18 5. This answering party objects generally to each of the "Instructions"
19 contained in Special Interrogatories, Set One on the grounds that such
20 "Instructions" are vague, ambiguous, overbroad, compound, unduly burdensome,
21 assumes facts not in evidence and denied, and oppressive, and if interpreted
22 literally, impossible to comply with and Plaintiff is using the "Instructions" to try
23 and evade in bad faith the faith the obligation of Plaintiff to describe by category
24 and with reasonable particularity the documents that Plaintiff is seeking and as
25 required pursuant to the provisions of Federal Rule of Civil Procedure
26 §34(b)(1)(A) and will not use them to respond to these requests to produce.

27 6. This answering party objects generally to each request as vague and
28 ambiguous to the extent it implies terms that this answering party cannot interpret

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1 while understood in the context of these requests or this litigation. Where possible,
2 this answering party has made reasonable assumptions as to the Propounding
3 Party's intended meaning and has responded accordingly, while preserving the
4 objection as to the vagueness and ambiguity.

5 7. Without waiving said objections, Responding Party states as follows:

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7 **REQUESTS FOR ADMISION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit YOU were interviewed as the subject of the PUBLICATION.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

11 Objection. This request is vague, ambiguous, and overly broad.

12 Without waiving the foregoing objections, the Responding Party states as
13 follows:

14 Admit.

15 **REQUEST FOR ADMISSION NO. 2:**

16 Admit YOU stated in the PUBLICATION that PLAINTIFF “was reaching
17 out to the Iranian government in the fall of 2021 with the following offer: ‘You
18 Iranians have \$8 billion frozen in a bank account in South Korea. My father will
19 unfreeze it in return for \$800 million being funneled into a numbered account for
20 us. And if you do this deal with us, it will lubricate other negotiations which have
21 recently started between us.’ By that, the Iranians believed that Hunter meant the
22 JCPOA talks, which had restarted in Geneva a month or two previously. In other
23 words, something along the lines of, ‘Pay us \$100 million and we let you keep 10
24 nukes, \$200 million for 20 nukes,’ etc. But I am making up the pricing.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

26 Objection. This request is vague, ambiguous, and overly broad. This
27 request is compound.

28 Without waiving the foregoing objections, the Responding Party states as

1 follows:

2 Admit.

3 **REQUEST FOR ADMISSION NO. 3:**

4 Admit YOU have no admissible evidence proving the truth of the following
5 statement made by YOU in the PUBLICATION: "Hunter Biden was reaching out
6 to the Iranian government in the fall of 2021 with the following offer: 'You
7 Iranians have \$8 billion frozen in a bank account in South Korea. My father will
8 unfreeze it in return for \$800 million being funneled into a numbered account for
9 us. And if you do this deal with us, it will lubricate other negotiations which have
10 recently started between us.' By that, the Iranians believed that Hunter meant the
11 JCPOA talks, which had restarted in Geneva a month or two previously. In other
12 words, something along the lines of, 'Pay us \$100 million and we let you keep 10
13 nukes, \$200 million for 20 nukes,' etc. But I am making up the pricing."

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

15 Objection. This request is vague, ambiguous, and overly broad. This
16 request is compound. This request is potentially invasive of the attorney client
17 privilege and/or attorney work product doctrine. This request violates the
18 Responding Party's right of privacy or the privacy rights of others.

19 Without waiving the foregoing objections, the Responding Party states as
20 follows:

21 Deny.

22 **REQUEST FOR ADMISSION NO. 4:**

23 Admit YOU have no DOCUMENTS proving the truth of the following
24 statement made by YOU in the PUBLICATION: "Hunter Biden was reaching out
25 to the Iranian government in the fall of 2021 with the following offer: 'You
26 Iranians have \$8 billion frozen in a bank account in South Korea. My father will
27 unfreeze it in return for \$800 million being funneled into a numbered account for
28 us. And if you do this deal with us, it will lubricate other negotiations which have

1 recently started between us.’ By that, the Iranians believed that Hunter meant the
2 JCPOA talks, which had restarted in Geneva a month or two previously. In other
3 words, something along the lines of, ‘Pay us \$100 million and we let you keep 10
4 nukes, \$200 million for 20 nukes,’ etc. But I am making up the pricing.”

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

6 Objection. This request is vague, ambiguous, and overly broad. This
7 request is compound. This request is potentially invasive of the attorney client
8 privilege and/or attorney work product doctrine. This request violates the
9 Responding Party’s right of privacy or the privacy rights of others.

10 Without waiving the foregoing objections, the Responding Party states as
11 follows:

12 Deny.

13 **REQUEST FOR ADMISSION NO. 5:**

14 Admit the following statement made by YOU in the PUBLICATION is
15 false: “Hunter Biden was reaching out to the Iranian government in the fall of 2021
16 with the following offer: ‘You Iranians have \$8 billion frozen in a bank account in
17 South Korea. My father will unfreeze it in return for \$800 million being funneled
18 into a numbered account for us. And if you do this deal with us, it will lubricate
19 other negotiations which have recently started between us.’ By that, the Iranians
20 believed that Hunter meant the JCPOA talks, which had restarted in Geneva a
21 month or two previously. In other words, something along the lines of, ‘Pay us
22 \$100 million and we let you keep 10 nukes, \$200 million for 20 nukes,’ etc. But I
23 am making up the pricing.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

25 Objection. This request is vague, ambiguous, and overly broad. This
26 request is compound. This request violates the Responding Party’s right of privacy
27 or the privacy rights of others.

28 Without waiving the foregoing objections, the Responding Party states as

1 follows:

2 Deny.

3 **REQUEST FOR ADMISSION NO. 6:**

4 Admit YOU knew the following statement made by YOU in the
5 PUBLICATION was false at the time YOU made it: “Hunter Biden was reaching
6 out to the Iranian government in the fall of 2021 with the following offer: ‘You
7 Iranians have \$8 billion frozen in a bank account in South Korea. My father will
8 unfreeze it in return for \$800 million being funneled into a numbered account for
9 us. And if you do this deal with us, it will lubricate other negotiations which have
10 recently started between us.’ By that, the Iranians believed that Hunter meant the
11 JCPOA talks, which had restarted in Geneva a month or two previously. In other
12 words, something along the lines of, ‘Pay us \$100 million and we let you keep 10
13 nukes, \$200 million for 20 nukes,’ etc. But I am making up the pricing.”

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

15 Objection. This request is vague, ambiguous, and overly broad. This
16 request is compound. This request violates the Responding Party’s right of privacy
17 or the privacy rights of others.

18 Without waiving the foregoing objections, the Responding Party states as
19 follows:

20 Deny.

21 **REQUEST FOR ADMISSION NO. 7:**

22 Admit YOU made the following statement in the PUBLICATION with the
23 intent to harm PLAINTIFF: “Hunter Biden was reaching out to the Iranian
24 government in the fall of 2021 with the following offer: ‘You Iranians have \$8
25 billion frozen in a bank account in South Korea. My father will unfreeze it in
26 return for \$800 million being funneled into a numbered account for us. And if you
27 do this deal with us, it will lubricate other negotiations which have recently started
28 between us.’ By that, the Iranians believed that Hunter meant the JCPOA talks,

1 which had restarted in Geneva a month or two previously. In other words,
2 something along the lines of, 'Pay us \$100 million and we let you keep 10 nukes,
3 \$200 million for 20 nukes,' etc. But I am making up the pricing."

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

5 Objection. This request is vague, ambiguous, and overly broad. This
6 request is compound. This request violates the Responding Party's right of privacy
7 or the privacy rights of others.

8 Without waiving the foregoing objections, the Responding Party states as
9 follows:

10 Deny.

11 **REQUEST FOR ADMISSION NO. 8:**

12 Admit YOU stated in the PUBLICATION that PLAINTIFF "was doing this
13 through a middleman, the son of the Minister of Defense of Pakistan. That son was
14 meeting with [PLAINTIFF], then relaying messages to someone in Iran."

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

16 Objection. This request is vague, ambiguous, and overly broad. This
17 request is compound. This request violates the Responding Party's right of privacy
18 or the privacy rights of others.

19 Without waiving the foregoing objections, the Responding Party states as
20 follows:

21 Admit.

22 **REQUEST FOR ADMISSION NO. 9:**

23 Admit YOU have no admissible evidence proving the truth of the following
24 statement made by YOU in the PUBLICATION: "[PLAINTIFF] was doing this
25 through a middleman, the son of the Minister of Defense of Pakistan. That son was
26 meeting with [PLAINTIFF], then relaying messages to someone in Iran."

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RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 10:

Admit YOU have no DOCUMENTS proving the truth of the following statement made by YOU in the PUBLICATION: "[PLAINTIFF] was doing this through a middleman, the son of the Minister of Defense of Pakistan. That son was meeting with [PLAINTIFF], then relaying messages to someone in Iran."

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request is potentially invasive of the attorney client privilege and/or attorney work product doctrine.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 11:

Admit the following statement made by YOU in the PUBLICATION is false: "[PLAINTIFF] was doing this through a middleman, the son of the Minister of Defense of Pakistan. That son was meeting with [PLAINTIFF], then relaying messages to someone in Iran."

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy

1 or the privacy rights of others.

2 Without waiving the foregoing objections, the Responding Party states as
3 follows:

4 Deny.

5 **REQUEST FOR ADMISSION NO. 12:**

6 Admit YOU knew the following statement made by YOU in the
7 PUBLICATION was false at the time YOU made it: “[PLAINTIFF] was doing this
8 through a middleman, the son of the Minister of Defense of Pakistan. That son was
9 meeting with [PLAINTIFF], then relaying messages to someone in Iran.”

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

11 Objection. This request is vague, ambiguous, and overly broad. This
12 request is compound. This request violates the Responding Party’s right of privacy
13 or the privacy rights of others.

14 Without waiving the foregoing objections, the Responding Party states as
15 follows:

16 Deny.

17 **REQUEST FOR ADMISSION NO. 13:**

18 Admit YOU made the following statement in the PUBLICATION with the
19 intent to harm PLAINTIFF: “[PLAINTIFF] was doing this through a middleman,
20 the son of the Minister of Defense of Pakistan. That son was meeting with
21 [PLAINTIFF], then relaying messages to someone in Iran.”

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

23 Objection. This request is vague, ambiguous, and overly broad. This
24 request is compound. This request violates the Responding Party’s right of privacy
25 or the privacy rights of others.

26 Without waiving the foregoing objections, the Responding Party states as
27 follows:

28 Deny.

REQUEST FOR ADMISSION NO. 14:

Admit YOU stated in the PUBLICATION that “[w]hen I returned, the agencies went to work over the weekend. I was told a week later that they had confirmed it all. The voice on the voicemail that I had acquired was voice-matched to the son of the Minister of Defense of Pakistan, who had a connection to Hunter Biden. Anyway, in December 2021, I was told that the scheme was confirmed across the agencies.”

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Admit.

REQUEST FOR ADMISSION NO. 15:

Admit YOU have no admissible evidence proving the truth of the following statement made by YOU in the PUBLICATION: “I was told a week later that they had confirmed it all. The voice on the voicemail that I had acquired was voice-matched to the son of the Minister of Defense of Pakistan, who had a connection to Hunter Biden. Anyway, in December 2021, I was told that the scheme was confirmed across the agencies.”

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 16:

Admit YOU have no DOCUMENTS proving the truth of the following statement made by YOU in the PUBLICATION: "I was told a week later that they had confirmed it all. The voice on the voicemail that I had acquired was voice-matched to the son of the Minister of Defense of Pakistan, who had a connection to Hunter Biden. Anyway, in December 2021, I was told that the scheme was confirmed across the agencies.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request is potentially invasive of the attorney client privilege and/or attorney work product doctrine.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 17:

Admit the following statement made by YOU in the PUBLICATION is false: "I was told a week later that they had confirmed it all. The voice on the voicemail that I had acquired was voice-matched to the son of the Minister of Defense of Pakistan, who had a connection to Hunter Biden. Anyway, in December 2021, I was told that the scheme was confirmed across the agencies."

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

1 **REQUEST FOR ADMISSION NO. 18:**

2 Admit YOU knew the following statement in the PUBLICATION was false
3 at the time YOU made it: "I was told a week later that they had confirmed it all.
4 The voice on the voicemail that I had acquired was voice-matched to the son of the
5 Minister of Defense of Pakistan, who had a connection to Hunter Biden. Anyway,
6 in December 2021, I was told that the scheme was confirmed across the agencies."

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

8 Objection. This request is vague, ambiguous, and overly broad. This
9 request is compound. This request violates the Responding Party's right of privacy
10 or the privacy rights of others.

11 Without waiving the foregoing objections, the Responding Party states as
12 follows:

13 Deny.

14 **REQUEST FOR ADMISSION NO. 19:**

15 Admit YOU made the following statement in the PUBLICATION with the
16 intent to harm PLAINTIFF: "I was told a week later that they had confirmed it all.
17 The voice on the voicemail that I had acquired was voice-matched to the son of the
18 Minister of Defense of Pakistan, who had a connection to Hunter Biden. Anyway,
19 in December 2021, I was told that the scheme was confirmed across the agencies."

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

21 Objection. This request is vague, ambiguous, and overly broad. This
22 request is compound. This request violates the Responding Party's right of privacy
23 or the privacy rights of others.

24 Without waiving the foregoing objections, the Responding Party states as
25 follows:

26 Deny.

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REQUEST FOR ADMISSION NO. 20:

Admit that on page 73 of the PUBLICATION, YOUR answer was “100% correct” in response to the following question: “Patrick, you are claiming that 18 months ago, the Biden Family was seeking a bribe from Iran to release finds frozen in South Korea, and to go easy in nuclear talks, and that the United States Government has been aware of this since December, 2021?”

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Admit.

REQUEST FOR ADMISSION NO. 21:

Admit that YOU have no admissible evidence to prove the truth of YOUR answer on page 73 of the PUBLICATION of “100% correct” in response to the following question: “Patrick, you are claiming that 18 months ago, the Biden Family was seeking a bribe from Iran to release finds frozen in South Korea, and to go easy in nuclear talks, and that the United States Government has been aware of this since December, 2021?”

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

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REQUEST FOR ADMISSION NO. 22:

Admit that YOU have no DOCUMENTS to prove the truth of YOUR answer on page 73 of the PUBLICATION of “100% correct” in response to the following question: “Patrick, you are claiming that 18 months ago, the Biden Family was seeking a bribe from Iran to release finds frozen in South Korea, and to go easy in nuclear talks, and that the United States Government has been aware of this since December, 2021?”

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others. This request is potentially invasive of the attorney client privilege and/or attorney work product doctrine.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 23:

Admit that YOUR answer on page 73 of the PUBLICATION of “100% correct” was in fact false in responding to the following question: “Patrick, you are claiming that 18 months ago, the Biden Family was seeking a bribe from Iran to release finds frozen in South Korea, and to go easy in nuclear talks, and that the United States Government has been aware of this since December, 2021?”

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU knew YOUR answer on page 73 of the PUBLICATION of “100% correct” was false when made in responding to the following question: “Patrick, you are claiming that 18 months ago, the Biden Family was seeking a bribe from Iran to release finds frozen in South Korea, and to go easy in nuclear talks, and that the United States Government has been aware of this since December, 2021?”

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU intended to harm PLAINTIFF as a result of YOUR answer on page 73 of the PUBLICATION of “100% correct” in responding to the following question: “Patrick, you are claiming that 18 months ago, the Biden Family was seeking a bribe from Iran to release finds frozen in South Korea, and to go easy in nuclear talks, and that the United States Government has been aware of this since December, 2021?”

RESPONSE TO REQUEST FOR ADMISSION NO. 25:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 26:

Admit that on October 8, 2023, YOU posted portions of YOUR DEFAMATORY STATEMENTS in the PUBLICATION on X (formerly known as Twitter).

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request calls for a legal conclusion or legal opinion.

Without waiving the foregoing objections, the Responding Party states as follows:

The Responding Party denies that he published statements knowing they were false and with actual malice and with the intent to harm the Plaintiff. The Responding Party admits that he published statements on X formerly known as Twitter back on October 8, 2023.

REQUEST FOR ADMISSION NO. 27:

Admit that on October 8, 2023, YOU posted portions of YOUR DEFAMATORY STATEMENTS in the PUBLICATION on X (formerly known as Twitter) with the intent to harm PLAINTIFF.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request calls for a legal conclusion or legal opinion.

Without waiving the foregoing objections, the Responding Party states as follows:

The Responding Party denies that he published statements knowing they were false and with actual malice and with the intent to harm the Plaintiff. The

1 Responding Party admits that he published statements on X formerly known as
2 Twitter back on October 8, 2023.

3 **REQUEST FOR ADMISSION NO. 28:**

4 Admit that YOU knew the portions of YOUR DEFAMATORY
5 STATEMENTS in the PUBLICATION that YOU posted on X (formerly known as
6 Twitter) on October 8, 2023 were false.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

8 Objection. This request is vague, ambiguous, and overly broad. This
9 request is compound. This request violates the Responding Party's right of privacy
10 or the privacy rights of others. This request calls for a legal conclusion or legal
11 opinion.

12 Without waiving the foregoing objections, the Responding Party states as
13 follows:

14 The Responding Party denies that he published statements knowing they
15 were false and with actual malice and with the intent to harm the Plaintiff and
16 denies that he knew the statements were false at the time of publication. The
17 Responding Party admits that he published statements on X formerly known as
18 Twitter back on October 8, 2023.

19 **REQUEST FOR ADMISSION NO. 29:**

20 Admit that YOU posted the portions of YOUR DEFAMATORY
21 STATEMENTS in the PUBLICATION on X (formerly known as Twitter) on
22 October 8, 2023, with the intent to suggest that PLAINTIFF's alleged dealings
23 with Iran had contributed to the terrorist attacks by Hamas against Israel on
24 October 7, 2023

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

26 Objection. This request is vague, ambiguous, and overly broad. This
27 request is compound. This request violates the Responding Party's right of privacy
28 or the privacy rights of others. This request calls for a legal conclusion or legal

1 opinion.

2 Without waiving the foregoing objections, the Responding Party states as
3 follows:

4 The Responding Party denies that he published statements knowing they
5 were false and with actual malice and with the intent to harm the Plaintiff and
6 denies that he knew the statements were false at the time of publication. The
7 Responding Party admits that he published statements on X formerly known as
8 Twitter back on October 8, 2023.

9 **REQUEST FOR ADMISSION NO. 30:**

10 Admit that when YOU posted the portions of YOUR DEFAMATORY
11 STATEMENTS in the PUBLICATION on X (formerly known as Twitter) on
12 October 8, 2023, YOU knew the resulting implication was that PLAINTIFF's
13 alleged dealings with Iran had contributed to the terrorist attacks by Hamas against
14 Israel on October 7, 2023.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

16 Objection. This request is vague, ambiguous, and overly broad. This
17 request is compound. This request violates the Responding Party's right of privacy
18 or the privacy rights of others. This request calls for a legal conclusion or legal
19 opinion.

20 Without waiving the foregoing objections, the Responding Party states as
21 follows:

22 The Responding Party denies that he published statements knowing they
23 were false and with actual malice and with the intent to harm the Plaintiff and
24 denies that he knew the statements were false at the time of publication. The
25 Responding Party admits that he published statements on X formerly known as
26 Twitter back on October 8, 2023.

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REQUEST FOR ADMISSION NO. 31:

Admit YOU appeared on *The Absolute Truth* with Emerald Robinson on May 10, 2023.

RESPONSE TO REQUEST FOR ADMISSION NO. 31:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Admit.

REQUEST FOR ADMISSION NO. 32:

Admit that during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 10, 2023, YOU stated that PLAINTIFF "was reaching out back channel to the Iranian government with this proposal: 'You Iranians have \$8 billion frozen in a South Korean bank, my father will sign to unfreeze it in return for \$800 million funneled into a numbered account for us and if you will do this it will lubricate the other discussions which have recently started between us,' by which, since this conversation was late November 2021, the Iranians took to mean the recently started nuclear negotiations. The Bidens were holding up their hand and saying you pay us this you can keep 10 nukes, you pay us this you can keep 20 nukes, they were offering that kind of a deal."

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Admit.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU have no admissible evidence to prove the truth of the following statement made during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 10, 2023, that PLAINTIFF “was reaching out back-channel to the Iranian government with this proposal: ‘You Iranians have \$8 billion frozen in a South Korean bank, my father will sign to unfreeze it in return for \$800 million funneled into a numbered account for us and if you will do this it will lubricate the other discussions which have recently started between us,’ by which, since this conversation was late November 2021, the Iranians took to mean the recently started nuclear negotiations. The Bidens were holding up their hand and saying you pay us this you can keep 10 nukes, you pay us this you can keep 20 nukes, they were offering that kind of a deal.”

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party’s right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU have no DOCUMENTS to prove the truth of the following statement made during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 10, 2023, that PLAINTIFF “was reaching out back-channel to the Iranian government with this proposal: ‘You Iranians have \$8 billion frozen in a South Korean bank, my father will sign to unfreeze it in return for \$800 million funneled into a numbered account for us and if you will do this it will lubricate the other discussions which have recently started between us,’ by which, since this conversation was late November 2021, the Iranians took to mean the recently

1 started nuclear negotiations. The Bidens were holding up their hand and saying you
2 pay us this you can keep 10 nukes, you pay us this you can keep 20 nukes, they
3 were offering that kind of a deal.”

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

5 Objection. This request is vague, ambiguous, and overly broad. This
6 request is compound. This request violates the Responding Party’s right of privacy
7 or the privacy rights of others. This request is potentially invasive of the attorney
8 client privilege and/or attorney work product doctrine.

9 Without waiving the foregoing objections, the Responding Party states as
10 follows:

11 Deny.

12 **REQUEST FOR ADMISSION NO. 35:**

13 Admit that the following statement made by YOU during YOUR appearance
14 on *The Absolute Truth* with Emerald Robinson on May 10, 2023, is false:

15 PLAINTIFF “was reaching out back-channel to the Iranian government with this
16 proposal: ‘You Iranians have \$8 billion frozen in a South Korean bank, my father
17 will sign to unfreeze it in return for \$800 million funneled into a numbered account
18 for us and if you will do this it will lubricate the other discussions which have
19 recently started between us,’ by which, since this conversation was late November
20 2021, the Iranians took to mean the recently started nuclear negotiations. The
21 Bidens were holding up their hand and saying you pay us this you can keep 10
22 nukes, you pay us this you can keep 20 nukes, they were offering that kind of a
23 deal.”

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

25 Objection. This request is vague, ambiguous, and overly broad. This
26 request is compound. This request violates the Responding Party’s right of privacy
27 or the privacy rights of others.

28 Without waiving the foregoing objections, the Responding Party states as

1 follows:

2 Deny.

3 **REQUEST FOR ADMISSION NO. 36:**

4 Admit that YOU knew the following statement made by YOU during YOUR
5 appearance on *The Absolute Truth* with Emerald Robinson on May 10, 2023, was
6 false when made: PLAINTIFF “was reaching out back-channel to the Iranian
7 government with this proposal: ‘You Iranians have \$8 billion frozen in a South
8 Korean bank, my father will sign to unfreeze it in return for \$800 million funneled
9 into a numbered account for us and if you will do this it will lubricate the other
10 discussions which have recently started between us,’ by which, since this
11 conversation was late November 2021, the Iranians took to mean the recently
12 started nuclear negotiations. The Bidens were holding up their hand and saying you
13 pay us this you can keep 10 nukes, you pay us this you can keep 20 nukes, they
14 were offering that kind of a deal.”

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

16 Objection. This request is vague, ambiguous, and overly broad. This
17 request is compound. This request violates the Responding Party’s right of privacy
18 or the privacy rights of others.

19 Without waiving the foregoing objections, the Responding Party states as
20 follows:

21 Deny.

22 **REQUEST FOR ADMISSION NO. 37:**

23 Admit YOU appeared on *The Absolute Truth* with Emerald Robinson on
24 May 11, 2023.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

26 Objection. This request is vague, ambiguous, and overly broad. This
27 request is compound. This request violates the Responding Party’s right of privacy
28 or the privacy rights of others.

1 Without waiving the foregoing objections, the Responding Party states as
2 follows:

3 Admit.

4 **REQUEST FOR ADMISSION NO. 38:**

5 Admit that during YOUR appearance on *The Absolute Truth* with Emerald
6 Robinson on May 11, 2023, YOU stated that “I met an old friend . . . I don’t want
7 to name names . . . I became aware of something that had happened – that Hunter
8 Biden was reaching out to [Iran] back channel and there are actually some
9 voicemails that confirmed everything I am telling you . . . an interagency group
10 centered in the FBI . . . was able to confirm 100% everything I’ve told you.”

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

12 Objection. This request is vague, ambiguous, and overly broad. This
13 request is compound. This request violates the Responding Party’s right of privacy
14 or the privacy rights of others.

15 Without waiving the foregoing objections, the Responding Party states as
16 follows:

17 Admit.

18 **REQUEST FOR ADMISSION NO. 39:**

19 Admit that YOU have no admissible evidence to prove the truth of YOUR
20 statements made during YOUR appearance on *The Absolute Truth* with Emerald
21 Robinson on May 11, 2023, in which YOU stated that “I met an old friend . . . I
22 don’t want to name names . . . I became aware of something that had happened –
23 that Hunter Biden was reaching out to [Iran] back channel and there are actually
24 some voicemails that confirmed everything I am telling you . . . an interagency
25 group centered in the FBI . . . was able to confirm 100% everything I’ve told you.”

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

27 Objection. This request is vague, ambiguous, and overly broad. This
28 request is compound. This request violates the Responding Party’s right of privacy

1 or the privacy rights of others.

2 Without waiving the foregoing objections, the Responding Party states as
3 follows:

4 Deny.

5 **REQUEST FOR ADMISSION NO. 40:**

6 Admit that YOU have no DOCUMENTS to prove the truth of YOUR
7 statements made during YOUR appearance on *The Absolute Truth* with Emerald
8 Robinson on May 11, 2023, in which YOU stated that “I met an old friend . . . I
9 don’t want to name names . . . I became aware of something that had happened –
10 that Hunter Biden was reaching out to [Iran] back channel and there are actually
11 some voicemails that confirmed everything I am telling you . . . an interagency
12 group centered in the FBI . . . was able to confirm 100% everything I’ve told you.”

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

14 Objection. This request is vague, ambiguous, and overly broad. This
15 request is compound. This request violates the Responding Party’s right of privacy
16 or the privacy rights of others. This request is potentially invasive of the attorney
17 client privilege and/or attorney work product doctrine.

18 Without waiving the foregoing objections, the Responding Party states as
19 follows:

20 Deny.

21 **REQUEST FOR ADMISSION NO. 41:**

22 Admit that the following statements YOU made during YOUR appearance
23 on *The Absolute Truth* with Emerald Robinson on May 11, 2023, were false: “I
24 met an old friend . . . I don’t want to name names . . . I became aware of something
25 that had happened – that Hunter Biden was reaching out to [Iran] back channel and
26 there are actually some voicemails that confirmed everything I am telling you . . .
27 an interagency group centered in the FBI . . . was able to confirm 100% everything
28 I’ve told you.”

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 42:

Admit that YOU knew the following statements YOU made during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 11, 2023, were false when made: "I met an old friend . . . I don't want to name names . . . I became aware of something that had happened – that Hunter Biden was reaching out to [Iran] back channel and there are actually some voicemails that confirmed everything I am telling you . . . an interagency group centered in the FBI . . . was able to confirm 100% everything I've told you."

RESPONSE TO REQUEST FOR ADMISSION NO. 42:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 43:

Admit that during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 11, 2023, YOU stated that "Hunter Biden and Joe Biden are selling out the country to Iran."

///

///

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Admit.

REQUEST FOR ADMISSION NO. 44:

Admit that YOU have no admissible evidence to prove the truth of YOUR statements made during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 11, 2023, in which YOU stated that "Hunter Biden and Joe Biden are selling out the country to Iran."

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Deny.

REQUEST FOR ADMISSION NO. 45:

Admit that YOU have no DOCUMENTS to prove the truth of YOUR statements made during YOUR appearance on *The Absolute Truth* with Emerald Robinson on May 11, 2023, in which YOU stated that "Hunter Biden and Joe Biden are selling out the country to Iran."

RESPONSE TO REQUEST FOR ADMISSION NO. 45:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request is potentially invasive of the attorney

1 client privilege and/or attorney work product doctrine.

2 Without waiving the foregoing objections, the Responding Party states as
3 follows:

4 Deny.

5 **REQUEST FOR ADMISSION NO. 46:**

6 Admit that the following statements YOU made during YOUR appearance
7 on *The Absolute Truth* with Emerald Robinson on May 11, 2023, were false:

8 “Hunter Biden and Joe Biden are selling out the country to Iran.”

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

10 Objection. This request is vague, ambiguous, and overly broad. This
11 request is compound. This request violates the Responding Party’s right of privacy
12 or the privacy rights of others.

13 Without waiving the foregoing objections, the Responding Party states as
14 follows:

15 Deny.

16 **REQUEST FOR ADMISSION NO. 47:**

17 Admit that YOU knew the following statements YOU made during YOUR
18 appearance on *The Absolute Truth* with Emerald Robinson on May 11, 2023, were
19 false when made: “Hunter Biden and Joe Biden are selling out the country to Iran.”

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

21 Objection. This request is vague, ambiguous, and overly broad. This
22 request is compound. This request violates the Responding Party’s right of privacy
23 or the privacy rights of others.

24 Without waiving the foregoing objections, the Responding Party states as
25 follows:

26 Deny.

27 ///

28 ///

REQUEST FOR ADMISSION NO. 48:

Admit that YOU received the October 26, 2023 letter from PLAINTIFF in which he demanded that YOU retract YOUR DEFAMATORY STATEMENTS.

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others.

Without waiving the foregoing objections, the Responding Party states as follows:

Admit.

REQUEST FOR ADMISSION NO. 49:

Admit that since the PUBLICATION's release on June 27, 2023, YOU have further disseminated YOUR DEFAMATORY STATEMENTS.

RESPONSE TO REQUEST FOR ADMISSION NO. 49:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request calls for a legal conclusion or legal opinion.

Without waiving the foregoing objections, the Responding Party states as follows:

The Responding Party denies he made knowingly false statements that were defamatory and with actual malice and intent to harm the Plaintiff. The Responding Party denies he further disseminated any false statements knowing they were false.

REQUEST FOR ADMISSION NO. 50:

Admit that since the PUBLICATION's release on June 27, 2023, YOU have republished YOUR DEFAMATORY STATEMENTS.

///

RESPONSE TO REQUEST FOR ADMISSION NO. 50:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request calls for a legal conclusion or legal opinion.

Without waiving the foregoing objections, the Responding Party states as follows:

The Responding Party denies he made knowingly false statements that were defamatory and with actual malice and intent to harm the Plaintiff. The Responding Party denies he further disseminated any false statements knowing they were false. The Responding Party admits that he republished his statements thereafter.

REQUEST FOR ADMISSION NO. 51:

Admit that YOUR DEFAMATORY STATEMENTS were made by YOU in the PUBLICATION, in part, because of the actual malice YOU have for PLAINTIFF.

RESPONSE TO REQUEST FOR ADMISSION NO. 51:

Objection. This request is vague, ambiguous, and overly broad. This request is compound. This request violates the Responding Party's right of privacy or the privacy rights of others. This request calls for a legal conclusion or legal opinion.

Without waiving the foregoing objections, the Responding Party states as follows:

The Responding Party denies he made knowingly false statements that were defamatory and with actual malice and intent to harm the Plaintiff.

REQUEST FOR ADMISSION NO. 52:

Admit that the DOCUMENT attached hereto as "Exhibit A" is a genuine copy of a portion of the PUBLICATION containing YOUR DEFAMATORY

1 STATEMENTS.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

3 Objection. This request is vague, ambiguous, and overly broad. This
4 request is compound. This request violates the Responding Party's right of privacy
5 or the privacy rights of others. This request calls for a legal conclusion or legal
6 opinion.

7 Without waiving the foregoing objections, the Responding Party states as
8 follows:

9 The Responding Party admits that Exhibit A is a genuine copy of his
10 publication. The Responding Party denies he made knowingly false statements
11 that were defamatory and with actual malice and intent to harm the Plaintiff.

12 **REQUEST FOR ADMISSION NO. 53:**

13 Admit that the DOCUMENT attached hereto as "Exhibit B" is a genuine
14 copy of a post YOU made on X (formerly known as Twitter) on October 8, 2023.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

16 Objection. This request is vague, ambiguous, and overly broad. This
17 request is compound. This request violates the Responding Party's right of privacy
18 or the privacy rights of others.

19 Without waiving the foregoing objections, the Responding Party states as
20 follows:

21 Admit.

22 **REQUEST FOR ADMISSION NO. 54:**

23 Admit that the DOCUMENT attached hereto as "Exhibit C" is a genuine
24 copy of a post YOU made on X (formerly known as Twitter) on October 8, 2023.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

26 Objection. This request is vague, ambiguous, and overly broad. This
27 request is compound. This request violates the Responding Party's right of privacy
28 or the privacy rights of others.

1 Without waiving the foregoing objections, the Responding Party states as
2 follows:

3 Admit.

4 **REQUEST FOR ADMISSION NO. 55:**

5 Admit that the DOCUMENT attached hereto as “Exhibit D” is a genuine
6 copy of a post YOU made on X (formerly known as Twitter) on October 8, 2023.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

8 Objection. This request is vague, ambiguous, and overly broad. This
9 request is compound. This request violates the Responding Party’s right of privacy
10 or the privacy rights of others.

11 Without waiving the foregoing objections, the Responding Party states as
12 follows:

13 Admit.

14 **REQUEST FOR ADMISSION NO. 56:**

15 Admit that the DOCUMENT attached hereto as “Exhibit E” is a genuine
16 copy of a post YOU made on X (formerly known as Twitter) on October 8, 2023.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

18 Objection. This request is vague, ambiguous, and overly broad. This
19 request is compound. This request violates the Responding Party’s right of privacy
20 or the privacy rights of others.

21 Without waiving the foregoing objections, the Responding Party states as
22 follows:

23 Admit.

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26 ///

27 ///

28 ///

1 Dated: September 19, 2024

LAW OFFICES OF MICHAEL C. MURPHY

2
3 By: /s/ Michael C. Murphy, Esq.

4
5
6 Michael C. Murphy, Esq.
7 Michael C. Murphy, Jr., Esq.
8 Attorneys for Defendant,
9 Patrick M. Bryne
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VERIFICATION

UNITED ARAB EMIRATES, DUBAI

I have read the foregoing **DEFENDANT PATRICK M. BYRNE'S RESPONSES TO REQUEST FOR ADMISSIONS, SET ONE FROM PLAINTIFF ROBERT HUNTER BIDEN**, and know its contents.

I am informed and believe that the matters stated in the foregoing documents are true.

Executed on September 11, 2024, at DUBAI (City/State).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Patrick Byrne

Print Full Name

Signature

PROOF OF SERVICE

UNITED STATES OF AMERICA

I am employed and am a resident of the County of Ventura, State of California.

I am over the age of 18 and not a party to the within action. My business name and address is as follows:

Law Offices of Michael C. Murphy
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

On September 19, 2024, I served the foregoing document(s) on Opposing Counsel in this action described as follows:

**1. DEFENDANT PATRICK M. BYRNE'S FURTHER RESPONSES
TO REQUESTS FOR ADMISSION, SET ONE, FROM PLAINTIFF
ROBERT HUNTER BIDEN**

_____ by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

_____ by placing a copy of the original enclosed in sealed envelopes addressed as follows ("U.S. Mail"):

 X by placing copies of the original through electronic transmission ("e-mail") to all parties appearing on the electronic service list as follows:

_____ by placing copies of the original through facsimile transmission ("fax") to all parties appearing on the service list as follows:

1 Paul B. Salvaty, Esq.
2 Winston & Strawn LLP
3 333 S. Grand Ave. 38th Floor
4 Los Angeles, CA 90071-1543
5 Tel: (213) 615-1700
6 Fax: (213) 615-1750
7 Email: PSalvaty@winston.com
8 Email: gaellis@winston.com

9 Abbe David Lowell, Esq.
10 1901 L St., N.W.
11 Washington, D.C. 20036-3508
12 Tel: (202) 282-5000
13 Fax: (202) 282-5100
14 Email:
15 AbbeLowellPublicOutreach@winston.com

16 Bryan M. Sullivan, Esq.
17 Zachary C. Hansen, Esq.
18 Early Sullivan Wright Gizer & McRae, LLP
19 6420 Wilshire Blvd., Suite 17th Fl.
20 Los Angeles, CA 90048
21 Tel: (323) 301-4660
22 Fax: (323) 301-4676
23 Email: rclaudat@earlysullivan.com
24 Email: zhansen@earlysullivan.com
25 Email: bsullivan@earlysullivan.com

Attorneys for Plaintiff
ROBERT HUNTER BIDEN

26 The sender's name and email address are as follows:

27 Name: Micheal C. Murphy, Esq.

28 Email: Michael@murphlaw.net.

____ (State) I declare under penalty of perjury under the laws of the State of
California and the United States of America that the above is true and correct.

X (Federal) I declare that I am employed in the office as a member of the bar
of this court at whose direction the service was made.

Executed on September 19, 2024 at Westlake Village, California.

By: /s/ Michael C. Murphy, Esq.